

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS  
CENTRAL DIVISION

**ROY HOLMES, TINA ALEXANDER,  
PATRICK NORRIS, and MELISSA GARNER,  
Each Individually and on Behalf of  
All Others Similarly Situated**

**PLAINTIFFS**

vs.

Case No. 4:20-cv-191-DPM

**STETSON COURIER, INC.  
and JOHN STETSON**

**DEFENDANTS**

**PLAINTIFFS' MOTION TO EXTEND THE POST-JUDGMENT DISCOVERY  
DEADLINE AND COMPEL DEPOSITION APPEARANCE**

Plaintiffs Roy Holmes, Tina Alexander, Patrick Norris, and Melissa Garner, by and through their attorneys of the Sanford Law Firm, PLLC, for their Motion to Extend the Post-Judgment Discovery Deadline and Compel Deposition Appearance, state as follows:

1. On 1 May 2024, Plaintiffs filed a Motion to Reopen Discovery, requesting leave to conduct post-judgment discovery in order to proceed with collection efforts against Defendants. ECF No. 166. This Court granted the Motion on 22 May 2024. ECF No. 167.

2. Plaintiffs served Defendants with their First Sets of Post-Judgment Interrogatories and Requests for Production of Documents on 7 June 2024. Defendants served their responses on 19 July 2024, but the responses were merely boilerplate answers and did not contain any of the information Plaintiffs requested. See Def. John Stetson's Answers to Discovery, attached as Ex. 1.

3. Plaintiffs served Defendant John Stetson with a Notice of Deposition on July 15, 2024. The deposition was to be conducted at Plaintiffs' counsel's office on 16 August 2024. See Notice of Oral Dep. of John Stetson, attached as Ex. 2. Defendant Stetson failed to appear at the properly noticed deposition.

4. Plaintiffs have reason to believe Defendants fraudulently dissolved "Stetson Courier" and are currently doing business under the name "Jetsun Courier" in order to avoid the judgment in this case but have not been able to verify this information because of Defendants' failure to respond to the post-judgment discovery served or appear at the noticed deposition.

5. This Court may enter an order directing Defendant Stetson to appear at oral deposition via its contempt powers, but only after the Court first enters an order compelling Defendant Stetson's appearance. *Seattle Times Co. v. Rhinehart*, 467 U.S. 20, 30 (1984); *Schleper v. Ford Motor Co., Auto. Div.*, 585 F.2d 1367, 1371 (8th Cir. 1978).

6. The post-judgment discovery deadline is currently 30 August 2024.

7. Plaintiffs respectfully request an additional 90 days in which to conduct post-judgment discovery and an Order from the Court compelling John Stetson's appearance at oral deposition on 20 September 2024, 1:00 p.m. Central Time, at 10800 Financial Centre Parkway, Suite 510, Little Rock, Arkansas 72211.

8. This extension will not cause undue delay or prejudice any party.

9. Counsel for Plaintiffs has conferred with counsel for Defendant Stetson Courier, Inc., regarding its stance as to this Motion and Defendant Stetson Courier, Inc. does not object to the requested extension of the post-judgment discovery period or that

the oral deposition of Mr. Stetson be taken. Defendant Stetson Courier, Inc.'s lack of objection to the relief requested by Plaintiff in this Motion is not and should not be construed as an admission to any of the factual allegations set forth in the Motion.

10. Defendant John Stetson is now *pro se* and has failed to engage with Plaintiffs' discovery requests or his previous counsel. See Renewed Motion to Withdraw as Counsel, ECF 168. Therefore, Plaintiffs assume his position is **Opposed**.

WHEREFORE, premises considered, Plaintiffs respectfully request an order of this Court extending the post-judgment discovery deadline for an additional 90 days and compelling John Stetson to appear for oral deposition, and for such other relief as may be just and proper.

Respectfully submitted,

**ROY HOLMES, TINA ALEXANDER,  
PATRICK NORRIS and MELISSA  
GARNER, PLAINTIFFS**

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